

**Exhibit No. 3**  
**Deposition of James Bradford**

In the Matter Of:

*EDWIN DRURY*

vs.

*OFFICER P. DZIWANOWSKI, et al.*

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*JAMES BRADFORD*

*July 14, 2016*

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MARYLAND

(Northern Maryland)

EDWIN DRURY :

Plaintiff :

vs. :

OFFICER P. DZIWANOWSKI, : CIVIL ACTION NO.:

et al. : 1:15-cv-03845-MJG

Defendants :

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11 Deposition of JAMES BRADFORD, taken on  
12 Thursday, July 14, 2016, at 11:00 a.m., at Iamele &  
13 Iamele, LLP, 201 N. Charles Street, Suite 400,  
14 Baltimore, Maryland, before Stephanie Sturm, Notary  
15 Public.

21 Reported by:  
22 Stephanie Sturm

JAMES BRADFORD - 07/14/2016

Pages 6..9

<p style="text-align: right;">Page 6</p> <p>1 exhibit.</p> <p>2 MR. IAMELE: Mr. Culpepper, are you okay</p> <p>3 with that?</p> <p>4 MR. CULPEPER: Yes.</p> <p>5 Q Can you tell me how old you are, sir?</p> <p>6 A Thirty-nine.</p> <p>7 Q Where do you live?</p> <p>8 A Severna Park, Maryland.</p> <p>9 Q Can you give me your address, please?</p> <p>10 A 506 Likeston Court L-I-K-E-S-T-O-N Severna</p> <p>11 Park, Maryland 21146.</p> <p>12 Q How long have you lived at that address?</p> <p>13 A Approximately, three years.</p> <p>14 Q In this particular case, we are going to be</p> <p>15 discussing some events that occurred back in 2014.</p> <p>16 During that window of time, you were living at the</p> <p>17 Likeston Court address, were you not?</p> <p>18 A No, I wasn't.</p> <p>19 Q You were not?</p> <p>20 A Yes, yes, right in that area, I moved. Like</p> <p>21 two and a half, three years.</p> <p>22 Q I will represent to you that one of the</p>	<p style="text-align: right;">Page 8</p> <p>1 a background investigation, a test. After you pass</p> <p>2 all of that and you get cleared, defensive tactics,</p> <p>3 first-aid, CPR, first responding stuff.</p> <p>4 Q Who conducts that training program?</p> <p>5 A Our training facility, our training</p> <p>6 department.</p> <p>7 Q Was that done by Anne Arundel County?</p> <p>8 A I believe it is, yes.</p> <p>9 Q In your capacity as a correctional officer,</p> <p>10 do you work 40 hours a week?</p> <p>11 A Forty-eight.</p> <p>12 Q Forty-eight hours per week?</p> <p>13 A Six eight-hour days.</p> <p>14 Q Do you have any other business endeavor that</p> <p>15 you are engaged in, or occupation?</p> <p>16 A I do some snow removal.</p> <p>17 Q Have you ever been involved in any</p> <p>18 landscaping business?</p> <p>19 A No.</p> <p>20 Q Are you a hunter?</p> <p>21 A Am I a hunter?</p> <p>22 Q Do you hunt?</p>
<p style="text-align: right;">Page 7</p> <p>1 calls that you made to Anne Arundel County indicates</p> <p>2 that you were residing there. Is that your</p> <p>3 recollection?</p> <p>4 A Yes. I'm just thinking two and a half,</p> <p>5 three years ballpark.</p> <p>6 Q Who do you live there with?</p> <p>7 A My wife and child.</p> <p>8 Q You are here today in uniform. In what</p> <p>9 capacity are you caused to wear a uniform? Where do</p> <p>10 you work?</p> <p>11 A Ordnance Road Correctional Facility for Anne</p> <p>12 Arundel County.</p> <p>13 Q How long have you worked at the Ordnance</p> <p>14 Road Correctional Facility?</p> <p>15 A About two years.</p> <p>16 Q Are you a correctional officer?</p> <p>17 A Yes.</p> <p>18 Q Did you undergo any particular training to</p> <p>19 become a CO?</p> <p>20 A Yes.</p> <p>21 Q Can you thumbnail that for me very briefly?</p> <p>22 A We go through -- just to get hired, there's</p>	<p style="text-align: right;">Page 9</p> <p>1 A Animals?</p> <p>2 Q Yes.</p> <p>3 A I have, yeah.</p> <p>4 Q Is there a taxidermy shop in Anne Arundel</p> <p>5 County that you frequent?</p> <p>6 A Yes.</p> <p>7 Q What is the name of that facility?</p> <p>8 A Hitchcock Taxidermy.</p> <p>9 Q Where is that located?</p> <p>10 A New Cut Road. I don't know the address.</p> <p>11 Q Have you had occasion to socialize with</p> <p>12 members of the Anne Arundel County Police Department</p> <p>13 at Hitchcock Taxidermy?</p> <p>14 A What do you mean?</p> <p>15 Q Do you ever run into Anne Arundel County</p> <p>16 police officers over there or talk to Anne Arundel</p> <p>17 County police officers over there?</p> <p>18 A No. Why would we talk? No.</p> <p>19 Q No?</p> <p>20 A No.</p> <p>21 Q Are you friends with any Anne Arundel County</p> <p>22 police officers?</p>

<p style="text-align: right;">Page 14</p> <p>1 <b>Q And you understood Cathy Jo to be married to</b>  2 <b>Anthony before she was married to Bradford West?</b>  3 MR. CULPEPER: Go ahead and answer.  4 MR. IAMELE: Just for the record,  5 Mr. Culpepper is stepping out.  6 MR. CULPEPER: Yes, I'm stepping out, and I  7 will return if it's still going on.  8 MR. IAMELE: And I understand that we have  9 your consent and authority to continue with the  10 proceedings?  11 MR. CULPEPER: You have my consent and  12 authority to proceed with the deposition without my  13 presence.  14 MR. IAMELE: Thank you, sir.  15 <b>Q I forgot the question I asked before</b>  16 <b>Mr. Culpepper stepped out.</b>  17 A Something about Bradford West and Cathy Jo  18 West. I don't know. It was something about them two.  19 <b>Q We'll move back to that in more precise</b>  20 <b>ways. How about a woman named Dale West or Dale</b>  21 <b>Martin?</b>  22 A I do not know of her at all. I couldn't</p>	<p style="text-align: right;">Page 16</p> <p>1 questions.  2 <b>How did you come to know Cathy Jo West was</b>  3 <b>selling this item?</b>  4 A God, how did I know? I want to say just  5 through mutual friends, because I'm sure I had said,  6 hey, looking for a trailer, and you know how word of  7 mouth is.  8 <b>Q Why were you looking for a trailer?</b>  9 A To make moving a skid loader around easier  10 for snow removal, stuff like that. Nothing big. It's  11 actually probably too much -- I mean it's too much  12 trailer, but.  13 <b>Q Is it correct, sir, that when you purchased</b>  14 <b>the trailer from Cathy Jo, she did not have possession</b>  15 <b>of it?</b>  16 A No, she didn't. She told me it was -- it  17 was, obviously, sitting under those power lines.  18 <b>Q We'll get there, too.</b>  19 A I'm sorry.  20 <b>Q I recognize that you're anticipating my</b>  21 <b>questions, but in order to make the record, I'll ask a</b>  22 <b>question, you answer it and then we'll move on from</b></p>
<p style="text-align: right;">Page 15</p> <p>1 tell you what she looks like. I didn't even know  2 Bradford West. I knew him as Brad. I didn't even  3 know his first name was the same as my last name.  4 It's weird.  5 <b>Q Did you have knowledge that at some point</b>  6 <b>Brad married Cathy Jo?</b>  7 A I had heard that. I had heard that.  8 <b>Q Did you know that Brad passed away shortly</b>  9 <b>thereafter?</b>  10 A I didn't even know when he passed away. I  11 heard something through the grapevine he had cancer or  12 something.  13 <b>Q I'm going to draw your attention back to</b>  14 <b>February of 2014. This may be a little easier.</b>  15 A All right.  16 <b>Q Did there come a point in time that you</b>  17 <b>purchased a trailer from Cathy Jo West?</b>  18 A Yes, and I believe you should have,  19 basically, a signed receipt thing.  20 <b>Q We'll get there.</b>  21 A Okay. Yes.  22 <b>Q Before we get there, I want to ask a couple</b></p>	<p style="text-align: right;">Page 17</p> <p>1 <b>there. Okay?</b>  2 A All right.  3 <b>Q When you made the purchase, she did not have</b>  4 <b>possession of it?</b>  5 A No.  6 <b>Q Did she explain to you why she didn't have</b>  7 <b>possession of the trailer?</b>  8 A She said it was -- she told me that it was  9 her trailer, because I, of course, contacted her to  10 say, hey, I'm looking for a trailer and I heard that  11 you had one that you might possibly sell. It wasn't  12 like somebody said it was for sale. They said you  13 might want to check with this lady and she's got it,  14 and I said okay, I'll give her a call. So I gave her  15 a call and I was told it needed some work, but she  16 would consider selling it.  17 <b>Q When she told you that she had a trailer to</b>  18 <b>sell, but did not have possession, did she explain why</b>  19 <b>she didn't have possession of it?</b>  20 A I believe what she told me was it was on --  21 she said it's a weird situation. She said it was her  22 husband's trailer, he went through a divorce, but it</p>

<p style="text-align: right;">Page 18</p> <p>1 was in her name, and I said okay, because I said I  2 don't want any drama or any problems out of a he said  3 she said.  4 I said I'm going to pay you by check and I  5 want a receipt, and, you know, I don't want anybody  6 accusing me of anything. She said no, no, it's in my  7 name, it's all legal, but she said the problem is the  8 trailer is sitting on BG&amp;E property, but it's behind  9 his house, which is now, I guess, his ex-wife residing  10 there, whatever. Their house, her house, I don't  11 know.  12 <b>Q Did Cathy Jo West ever indicate to you why</b>  13 <b>the trailer was located behind Bradford West's</b>  14 <b>ex-wife's home?</b>  15 A No. I honestly figured it was just he once  16 resided there and you're going to leave your wife and  17 go marry somebody else. I just assumed where are you  18 going to put a damn near 30-foot trailer? You know?  19 I didn't think nothing of it, no. It's not like you  20 can park it on the street.  21 <b>Q Was there ever any point in time when you</b>  22 <b>went over to 8257 New Cut Road, which is where the</b></p>	<p style="text-align: right;">Page 20</p> <p>1 <b>Q And after you purchased it from her, you</b>  2 <b>never took delivery of the trailer?</b>  3 A Never.  4 <b>Q And you've never had the trailer in your</b>  5 <b>possession at any point in time?</b>  6 A No, sir.  7 <b>Q When you made the purchase from Cathy Jo</b>  8 <b>West, was there any agreement or understanding as to</b>  9 <b>when and/or how you would take delivery of the</b>  10 <b>trailer?</b>  11 A No. She just said that she would make some  12 phone calls. She said it's a new wife and an ex-wife,  13 so she said there would probably be some conflict  14 there, but she would try and work something out so I  15 could get access on the BG&amp;E property through their  16 driveway or whatever. Actually, I said look, that's  17 why I said I want a signed receipt and I'm paying with  18 a check. I don't want any issues with this. I  19 understand it's an as-is buy and needs some work.  20 That's what it was based on.  21 <b>Q What did you pay her for the trailer?</b>  22 A Don't quote me. I want to say \$1,500.00.</p>
<p style="text-align: right;">Page 19</p> <p>1 ex-wife lives, to make a visual inspection of the  2 trailer and, just to sharpen that up a little bit,  3 prior to the point where you tendered the check to  4 Cathy Jo West?  5 A Actually, no. I had only seen it from a  6 distance when I dropped a deer off to get processed or  7 something like that. You know what I mean?  8 <b>Q Is that at the taxidermy?</b>  9 A That's their shop, yes. I don't know the  10 addresses. I would assume it's -- I would assume it's  11 next to her, I don't know, because I can see the  12 trailer from his property. I just don't know the  13 addresses.  14 <b>Q Did Cathy Joe West provide you with any</b>  15 <b>photographs of the trailer before you purchased it?</b>  16 A No.  17 <b>Q So it would be correct that you never</b>  18 <b>actually saw the trailer before you gave her the check</b>  19 <b>for the purchase?</b>  20 A Physically like put my hands on it?  21 <b>Q Yes.</b>  22 A No.</p>	<p style="text-align: right;">Page 21</p> <p>1 <b>Q And the check, was that a personal check</b>  2 <b>that you used?</b>  3 A It was a business check for snow removal.  4 <b>Q What is the name of your snow removal</b>  5 <b>business?</b>  6 A J.R. Lee Home Improvements.  7 <b>Q J.R. Lee Home Improvements?</b>  8 A Yes, sir.  9 <b>Q Is J.R. Lee Home Improvements incorporated?</b>  10 A I can't remember. I honestly can't  11 remember. I just use it for snow removal just to be  12 legal.  13 <b>Q Do you have any employees?</b>  14 A No. It's me. Push snow with a truck and  15 skidsteer every now and now.  16 <b>Q Did you have a good year this year?</b>  17 A No, I actually didn't do anything this year.  18 I've just been too busy and I didn't do anything.  19 <b>Q I'm going to ask you to take a look at what</b>  20 <b>has been marked Exhibit 2 for purposes of your</b>  21 <b>deposition.</b>  22 A (Reviewing photographs).</p>

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<p style="text-align: right;">Page 26</p> <p>1 see, I'm now looking at page 2 of Exhibit 6, in the  2 upper left corner, it appears to me that that says  3 February 4, 2014.</p> <p>4 A I don't know what that is. 21 or 4, your  5 guess is as good as mine.</p> <p>6 Q These photographs of this title, did you  7 take these? When I say "these", I mean both of the  8 pictures that comprise Exhibit 6 for purposes of your  9 deposition.</p> <p>10 A I might have. I'm usually very careful. If  11 I'm doing something like this, I want to document as  12 much as I can. As far as like DMV, they keep the old  13 title, and I just didn't want it to disappear. Yes, I  14 would think I took these.</p> <p>15 Q But you're not able to say for sure?</p> <p>16 A I'm not able to say for sure. I would lean  17 toward -- I know that DMV would keep the title. Like  18 this title, I don't know where it would be now, but if  19 you go to DMV to do a title transfer, they keep the  20 old title, I believe, and I think I wanted to make  21 sure I had some sort of documentation that this is all  22 her information and nobody else's.</p>	<p style="text-align: right;">Page 28</p> <p>1 seen and what I have been told and I went to the DMV.  2 When I went to the DMV, I explained the situation to  3 the person behind the desk, and I said before you  4 transfer this title, can you verify that this is the  5 only owner of this trailer, that this is the only  6 registered owner to the trailer, and they confirmed  7 yes, it was, and I said okay, because I'm buying this  8 in a supposed divorce and I don't want any problems.  9 She's assuring me that it's legal and I said okay.</p> <p>10 Q What, if anything else, did you do?</p> <p>11 A I paid for the title and temporary tags,  12 because they said it was clean. I said I paid for the  13 tags, temporary tags, title transfer, and I think that  14 was it, I think.</p> <p>15 Q And then what was your next course of  16 action?</p> <p>17 A I think Cathy, I think, had tried to -- I  18 think there might have been contact to whoever it is,  19 his ex-wife and, apparently, it didn't go well.</p> <p>20 Q I imagine not.</p> <p>21 A Right. You know what I mean? And it was  22 basically put to me like, yeah, she don't want anybody</p>
<p style="text-align: right;">Page 27</p> <p>1 Q Let me ask you this. Once you purchased the  2 trailer, recognizing that you didn't get physical  3 possession of the trailer, what did you leave from  4 Cathy Jo West's house with? Did she give you  5 anything?</p> <p>6 A Just, I think, the title -- no. Hold on. I  7 think it was just the title. I think I just gave her  8 a check and she handed me the title, and I felt  9 confident that that was sufficient, and I made her  10 sign a written receipt.</p> <p>11 Q Do you, by chance, have a copy of the  12 receipt?</p> <p>13 A I thought it was turned in.</p> <p>14 Q And I want you to appreciate this. This is  15 a different proceeding than the criminal proceeding,  16 so some of what you tendered to the State's attorney I  17 may not be privy to.</p> <p>18 A I don't know. I would have to -- I would  19 have to look or something.</p> <p>20 Q Once you obtained the title to the trailer,  21 what was your next course of action?</p> <p>22 A I wanted to further validate what I have</p>	<p style="text-align: right;">Page 29</p> <p>1 on her property.</p> <p>2 Q Who told you that? Cathy Jo?</p> <p>3 A Yeah.</p> <p>4 Q At that point in time, you had a title that  5 was issued to you by the DMV?</p> <p>6 A By DMV.</p> <p>7 Q In your name?</p> <p>8 A Yes, sir.</p> <p>9 Q And you also had the temporary tags?</p> <p>10 A Yes, to be able to transport.</p> <p>11 Q Sure.</p> <p>12 Do you currently have possession of that  13 title and those temporary tags?</p> <p>14 A Somewhere.</p> <p>15 Q Once Cathy Jo contacts I'm going to call her  16 Dale Martin, that's Bradford West's ex-wife --</p> <p>17 A Dale?</p> <p>18 Q Dale. And indicates that she wanted access  19 of the property to get the trailer and --</p> <p>20 A This is what I was told.</p> <p>21 Q And this is all told to you by Cathy Jo  22 West?</p>

<p style="text-align: right;">Page 30</p> <p>1 A Yes.</p> <p>2 Q Can you put a timeframe on that? How many</p> <p>3 days after the purchase?</p> <p>4 A I told her, I said get the ball rolling,</p> <p>5 because if I go and buy it, I want to start working on</p> <p>6 the trailer and getting it cleaned up. I just bought</p> <p>7 it from you, and I'm not just buying something from</p> <p>8 you for you to just sit on.</p> <p>9 Q When you went to the DMV, was it the same</p> <p>10 day that you made the purchase?</p> <p>11 A It couldn't have been. If it wasn't the</p> <p>12 same day, it wouldn't have been but the next day or</p> <p>13 two.</p> <p>14 Q Within the week?</p> <p>15 A Oh, yes, yes.</p> <p>16 Q Did you ask Cathy Jo to facilitate your</p> <p>17 access to the trailer within a week?</p> <p>18 A I just made a blanket statement I'm going to</p> <p>19 go down to DMV and I want to make sure through them</p> <p>20 that everything you're telling me is accurate before I</p> <p>21 transfer this. I said if they tell me otherwise, then</p> <p>22 I'm coming back and I'm canceling my check. I said</p>	<p style="text-align: right;">Page 32</p> <p>1 Q You never went there and talked to the woman</p> <p>2 who lived in that home?</p> <p>3 A No. I don't think anybody was living there.</p> <p>4 I actually think the house was not abandoned, but I</p> <p>5 don't believe anybody was living there.</p> <p>6 Q Was there fencing around that property?</p> <p>7 A No. There's a dividing fence, just like</p> <p>8 panel fence between that property and that property,</p> <p>9 but nothing that gated front or back. You know what</p> <p>10 I'm saying? And being that it abutted BG&amp;E property,</p> <p>11 you would think there would be a back fence to</p> <p>12 separate you from other property, but, no.</p> <p>13 Q Can I ask you this, Mr. Bradford, if the</p> <p>14 house was seemingly abandoned and the trailer was</p> <p>15 sitting in the back there, why didn't you simply go</p> <p>16 over there and pick it up?</p> <p>17 A Because it wasn't on legal property. That's</p> <p>18 trespassing. I'm not going to do it. If I would have</p> <p>19 had Gail's permission -- is it Gail?</p> <p>20 Q Dale.</p> <p>21 A Dale. If I had had Dale's permission, or</p> <p>22 had a way to contact her and she would meet me there,</p>
<p style="text-align: right;">Page 31</p> <p>1 but if it's legit, and she assured me it was, then I</p> <p>2 would expect to get the trailer in a reasonable amount</p> <p>3 of time, because I was going to take it and have it</p> <p>4 sandblasted and everything else, cleaned up and all</p> <p>5 new boards put on, stuff like that, the lights.</p> <p>6 Q Get it back to running order?</p> <p>7 A Yes.</p> <p>8 Q Do you happen to know how long the trailer</p> <p>9 had been sitting behind the New Cut Road address?</p> <p>10 A I couldn't tell you at all. I don't pay</p> <p>11 attention, not to that stuff. I didn't care.</p> <p>12 Q Was there ever any point in time that you</p> <p>13 personally went to 8257 New Cut Road in an attempt to</p> <p>14 pick up the trailer?</p> <p>15 A What is "8257"?</p> <p>16 Q That's the property that is contiguous with</p> <p>17 the power lines shown in this photograph.</p> <p>18 A You mean the property in front of where the</p> <p>19 trailer is sitting?</p> <p>20 Q Yes.</p> <p>21 A No, I never, no, because she told me that it</p> <p>22 was in a divorce, so to me that's trespassing.</p>	<p style="text-align: right;">Page 33</p> <p>1 I would have removed it, but I'm not like that.</p> <p>2 Q At any point in time, did Cathy Jo West</p> <p>3 indicate to you that Dale Martin was refusing to allow</p> <p>4 you access to the trailer because it was marital</p> <p>5 property in the divorce between Bradford West and Dale</p> <p>6 Martin?</p> <p>7 A Again, of course, it was divorce talk and</p> <p>8 just what I took as bickering between a new wife,</p> <p>9 ex-wife, and, you know, there's always a sour taste.</p> <p>10 That's all I took it as. It wasn't like no, you're</p> <p>11 not taking it because. You know what I mean? Like</p> <p>12 I'm not letting anybody come through my property.</p> <p>13 That's basically how it was put to me. And that's --</p> <p>14 go ahead.</p> <p>15 Q If I were to indicate that almost three</p> <p>16 months elapsed from the date that you purchased the</p> <p>17 trailer until the date that you called the police on</p> <p>18 April 23, 2014, is that about correct?</p> <p>19 A If there's something documenting it, but</p> <p>20 other than that, I don't remember. I couldn't tell</p> <p>21 you.</p> <p>22 Q And other than the one communication you</p>



<p style="text-align: right;">Page 34</p> <p>1 just described with Cathy Jo West, did you have other</p> <p>2 communications with her about gaining access to the</p> <p>3 trailer?</p> <p>4 A No. Just basically what I've told you.</p> <p>5 She's not easy to get ahold of either. That's another</p> <p>6 reason there. But nothing led me to believe that,</p> <p>7 once DMV confirmed it was her name and solely in her</p> <p>8 name and there was no garbage with the divorce, I</p> <p>9 didn't have any fears that it wouldn't -- I was just</p> <p>10 like okay, I'm a patient person, whenever the grudge</p> <p>11 is over, I'll grab it. I had no immediate use for it.</p> <p>12 I was just going to get it cleaned up, and that was</p> <p>13 going to take some time in itself and there was</p> <p>14 \$1,500.00 on the line. It wasn't like a \$10,000.00</p> <p>15 deal. You know what I mean?</p> <p>16 Q Is it correct that from the date that you</p> <p>17 purchased the trailer until the date that you called</p> <p>18 the police the first time on April 23, 2014, you had</p> <p>19 never had physical possession of the trailer?</p> <p>20 A I've never touched the trailer. I don't</p> <p>21 think I've ever even more than -- I can say I</p> <p>22 definitely took that picture, but, again, I'm on BG&amp;E</p>	<p style="text-align: right;">Page 36</p> <p>1 trailer.</p> <p>2 Q When you called the police, was it 911?</p> <p>3 A Yeah. I think non emergency, I think.</p> <p>4 Yeah, it would be the police, wouldn't it? You call</p> <p>5 the police.</p> <p>6 Q Before you called the police on April 23,</p> <p>7 2014, did you ever make any criminal complaint</p> <p>8 regarding the trailer, meaning had you reported it</p> <p>9 stolen, had you indicated that somebody was not</p> <p>10 allowing you access to it?</p> <p>11 A I don't believe so. I don't believe so.</p> <p>12 Q So this would be the first occasion that you</p> <p>13 made formal efforts to try to gain access to the</p> <p>14 trailer?</p> <p>15 A Yeah, possibly. This is two years ago. I</p> <p>16 mean if this is the only record, I would say yeah.</p> <p>17 Q Prior to that, had you ever asked Cathy Jo</p> <p>18 for your money back?</p> <p>19 A No. Like I said before, I knew there was no</p> <p>20 immediate use for it. The trailer needed a lot of</p> <p>21 work and there was no intention to be like, okay, I'm</p> <p>22 going to go get the trailer and use it next week. You</p>
<p style="text-align: right;">Page 35</p> <p>1 property and that's all the contact I'll have with it.</p> <p>2 Q And you've never had that trailer on any</p> <p>3 parcel of your property? I know that's an obvious</p> <p>4 question, but.</p> <p>5 A No. Shit, I ain't even got room for it.</p> <p>6 I'm sorry to say "shit".</p> <p>7 Q I'm sure she's heard it before.</p> <p>8 I'm going to show you what has been marked</p> <p>9 Bradford 3. I know it's a document you may not be</p> <p>10 familiar with. I'll represent to you that this is a</p> <p>11 CAD record, which is a Computer Aided Dispatch record.</p> <p>12 Okay?</p> <p>13 A (Reviewing document). Okay.</p> <p>14 Q It is a call for service from 7973 Catherine</p> <p>15 Avenue on April 23rd at 19:12:55, which is 7:12 p.m.</p> <p>16 A Catherine Avenue, where is that? Oh, is</p> <p>17 that the Royal Farm?</p> <p>18 Q Let me ask you this way first.</p> <p>19 Do you recall making a telephone call to 911</p> <p>20 on April 23, 2014?</p> <p>21 A I don't know about the date, but I</p> <p>22 definitely called the police in reference to this</p>	<p style="text-align: right;">Page 37</p> <p>1 know what I mean? I was in no hurry. I had plans to</p> <p>2 completely restore the trailer and bring it back to</p> <p>3 good working order, so it wasn't going to be readily</p> <p>4 available anyway.</p> <p>5 Q Let me play a call for you. I'm going to</p> <p>6 play what Mr. Culpepper and I have agreed is the 911</p> <p>7 call from that date, and then I'm going to ask you if</p> <p>8 it's your voice, and then I'm going to ask you some</p> <p>9 questions about it. Okay?</p> <p>10 A Okay.</p> <p>11 (911 recording playback).</p> <p>12 Q I want to ask you a couple questions about</p> <p>13 that. First and foremost, that's your voice?</p> <p>14 A Yes, yeah. At first, I was like that</p> <p>15 doesn't sound like me, and then I remembered I had</p> <p>16 just gotten out of the hospital with the flu.</p> <p>17 Q You were driving a burgundy Maxima at that</p> <p>18 point in time as a rental car?</p> <p>19 A I guess, apparently. I would never be in a</p> <p>20 car.</p> <p>21 Q You made some indications during the course</p> <p>22 of that call and I want to know how you came in</p>

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<p style="text-align: right;">Page 38</p> <p>1 possession of the information. For example, you</p> <p>2 indicated to the 911 operator that the trailer had</p> <p>3 been titled to the woman who sold you the trailer her</p> <p>4 husband's name. What did you understand about that</p> <p>5 and how did you come to understand that?</p> <p>6 A Say it again.</p> <p>7 Q Sure.</p> <p>8 Do you remember how you came to understand</p> <p>9 that at some point the trailer had been titled in --</p> <p>10 A In his new wife's name.</p> <p>11 Q In the call, you said it had been titled in</p> <p>12 the husband's name initially.</p> <p>13 A I didn't hear that.</p> <p>14 Q Do you want to go back and play it again?</p> <p>15 A It doesn't matter. I mean I know I said it</p> <p>16 was in his new wife's name.</p> <p>17 Q You did.</p> <p>18 A My apologies.</p> <p>19 Q That's okay.</p> <p>20 (911 recording playback).</p> <p>21 A They told me at the DMV. That was just</p> <p>22 verbally said to me.</p>	<p style="text-align: right;">Page 40</p> <p>1 other names than the two that I mentioned to them.</p> <p>2 Q Now, you also indicated to the 911 operator</p> <p>3 that you had some understanding that Dale Martin, who</p> <p>4 was the woman who lived at the property where the</p> <p>5 trailer was located, sold it to somebody?</p> <p>6 A Right.</p> <p>7 Q Tell me about that? How did you come to</p> <p>8 know that she had sold it?</p> <p>9 A It was more of an assumption, because a</p> <p>10 company truck was seen pulling out with the trailer</p> <p>11 off the property, and it was brought to my attention</p> <p>12 that there were some other people here moving a</p> <p>13 trailer that wasn't theirs.</p> <p>14 Q And based on that, you came to understand</p> <p>15 that Dale Martin had sold it to somebody?</p> <p>16 A I assumed she had. Somebody was moving a</p> <p>17 trailer that I knew I just bought.</p> <p>18 Q I understand that.</p> <p>19 What I'm looking for, it's a pretty specific</p> <p>20 thing to say, this woman who doesn't have a right to</p> <p>21 this trailer sold it to somebody, and what I'm trying</p> <p>22 to investigate is how you came to know that she made a</p>
<p style="text-align: right;">Page 39</p> <p>1 Q So the DMV told you that at some point the</p> <p>2 trailer had been in Bradford West's name?</p> <p>3 A Yes.</p> <p>4 Q And you understood Bradford West to be Cathy</p> <p>5 Jo West's now deceased husband?</p> <p>6 A Yes.</p> <p>7 Q And you understood Bradford West to be Dale</p> <p>8 West's ex-husband, the woman who was holding you</p> <p>9 hostage? I know it's complicated.</p> <p>10 A Yes.</p> <p>11 Q And that was told to you at the DMV?</p> <p>12 A Yes, the DMV confirmed, because I said I</p> <p>13 need to make sure, just being a logical person, I want</p> <p>14 to know that there is no other name other than a</p> <p>15 possible Brad West or Cathy West related to this</p> <p>16 title. If there's any other names on it, I was going</p> <p>17 to refuse it and go back to Cathy and get my money</p> <p>18 back, or cancel the check.</p> <p>19 Q Did whomever you spoke to at DMV tell you</p> <p>20 when the title had been transferred from Bradford West</p> <p>21 to Cathy Jo West?</p> <p>22 A They just said it was clean and it had no</p>	<p style="text-align: right;">Page 41</p> <p>1 sale?</p> <p>2 A Because there was a company name on the</p> <p>3 truck and info, because it was a commercial vehicle I</p> <p>4 believe, and I took that information and looked it up</p> <p>5 and then called the number and spoke to -- at the</p> <p>6 time, I didn't know who it was, but it was apparently</p> <p>7 the guy that took the trailer. I was very cordial</p> <p>8 about it, I said, sir, I think there's been a mistake,</p> <p>9 and I want to make sure neither one of us gets screwed</p> <p>10 here.</p> <p>11 You were seen picking up a trailer, which</p> <p>12 that person said yes. I said that trailer is mine. I</p> <p>13 said I bought that trailer. It's a weird situation,</p> <p>14 but I went and bought the trailer. I went to the DMV</p> <p>15 and had everything confirmed, and I have a title and</p> <p>16 registration for that trailer with temporary tags, but</p> <p>17 I was not allowed to move it.</p> <p>18 That was his next question, why didn't you</p> <p>19 go get it? I said because I was told I wasn't allowed</p> <p>20 on the property through another source, which was</p> <p>21 Cathy, and he said well, I just bought the trailer and</p> <p>22 you're not getting it.</p>

<p style="text-align: right;">Page 42</p> <p>1 I said look, I'm trying to be cool here.</p> <p>2 I'm letting you know that if you don't return the</p> <p>3 trailer, I'm going to have to call the police and</p> <p>4 report it stolen, because I have everything here that</p> <p>5 says it's mine. He started getting a little nasty on</p> <p>6 the phone, and I said I'm not going to argue with you,</p> <p>7 just give me the trailer back and squashed. I don't</p> <p>8 care. I mean it's a mistake.</p> <p>9 You can go take it up with her. You</p> <p>10 probably don't even know all of this. I said I'm</p> <p>11 trying to help you out and help myself out. He goes I</p> <p>12 paid \$2,200.00 cash for this trailer. I said well,</p> <p>13 you need to take that up with her, because she sold</p> <p>14 you a trailer that she shouldn't have sold. I said</p> <p>15 I'm telling you I have a legal title and registration</p> <p>16 for this and no reason to say it's not mine.</p> <p>17 <b>Q When was that conversation, do you know?</b></p> <p>18 A I can't remember the day it was pulled out.</p> <p>19 I don't know. I don't know.</p> <p>20 <b>Q Just to backtrack on a couple things.</b></p> <p>21 <b>The truck that removed the trailer from the</b></p> <p>22 <b>property, that's not something that you personally</b></p>	<p style="text-align: right;">Page 44</p> <p>1 <b>buying the trailer?</b></p> <p>2 A Yes. I'm one of their customers. They were</p> <p>3 being observant and said hey, I thought you were</p> <p>4 buying that trailer, and I said I did. They said are</p> <p>5 you having somebody tow it out of here? I said no.</p> <p>6 They said well, somebody's pulling it out of here with</p> <p>7 a small dump truck, a commercial truck.</p> <p>8 <b>Q Did they describe the person who was pulling</b></p> <p>9 <b>it out of there?</b></p> <p>10 A No. They just saw the lettering on the</p> <p>11 truck, the name and the number, and then I looked it</p> <p>12 up.</p> <p>13 <b>Q They just told you the truck that removed</b></p> <p>14 <b>the trailer?</b></p> <p>15 A Yeah, because they thought it was being</p> <p>16 stolen. They were looking out for everybody. It</p> <p>17 wasn't like, hey, this is your trailer leaving. It</p> <p>18 was I think somebody might be stealing this trailer</p> <p>19 then, because they thought I was buying it and then</p> <p>20 here somebody shows up and is hauling it out of there.</p> <p>21 Like I told you, I believed the property at the time</p> <p>22 was not being lived in.</p>
<p style="text-align: right;">Page 43</p> <p>1 <b>observed, is it?</b></p> <p>2 A No.</p> <p>3 <b>Q Who told you that the trailer had been</b></p> <p>4 <b>moved?</b></p> <p>5 A The neighbor.</p> <p>6 <b>Q What is his or her name?</b></p> <p>7 A I think it's one of the neighbors, the</p> <p>8 people next door at the taxidermy shop.</p> <p>9 <b>Q How did they know to contact you when the</b></p> <p>10 <b>trailer was moved?</b></p> <p>11 A They didn't. They knew I was -- I told them</p> <p>12 I said I'm buying that trailer. I said I found the</p> <p>13 owner and I'm working out a deal. I'm working out a</p> <p>14 thing about a trailer, but, apparently, because of the</p> <p>15 divorce I can't go get the trailer, and I have to see</p> <p>16 what's what waiting for this to pan itself all out.</p> <p>17 Then they saw that it was like a small dump truck or</p> <p>18 something they said that picked it up, hooked up to it</p> <p>19 and pulled it out of there. They were just being</p> <p>20 observant.</p> <p>21 <b>Q They knew to call you, because you</b></p> <p>22 <b>previously had a conversation where you said I'm</b></p>	<p style="text-align: right;">Page 45</p> <p>1 <b>Q I think Dale Martin was living there at the</b></p> <p>2 <b>time.</b></p> <p>3 A I don't know.</p> <p>4 <b>Q And I believe the trailer, I'll represent to</b></p> <p>5 <b>you, was locked up at the time.</b></p> <p>6 <b>So once you received that telephone call and</b></p> <p>7 <b>that information, what was your next course of</b></p> <p>8 <b>conduct? What did you do?</b></p> <p>9 A After I contacted the supposed driver of the</p> <p>10 truck?</p> <p>11 <b>Q Just to get the timeline right, someone from</b></p> <p>12 <b>the taxidermy shop called you and says I saw a truck</b></p> <p>13 <b>with High Noon Paving removing the trailer. You then</b></p> <p>14 <b>did like an internet search I'm assuming?</b></p> <p>15 A Yeah, um-hum.</p> <p>16 <b>Q And you got a telephone number for High Noon</b></p> <p>17 <b>Paving?</b></p> <p>18 A Um-hum.</p> <p>19 <b>Q You called immediately thereafter?</b></p> <p>20 A A short time after. Like I said, I was down</p> <p>21 with the -- I wasn't even out. Like I hadn't been out</p> <p>22 in almost two weeks. I had the flu and everything. I</p>

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1 was down.

2 Q And the person to whom you spoke said I

3 purchased the trailer from Dale Martin, or the woman

4 who was at that house?

5 A I bought the trailer. That's all that was

6 basically said.

7 Q And he told you the purchase price?

8 A Yes. I said I've already previously bought

9 this trailer. I said I think there might be some

10 mistake here, and I think you need to keep this from

11 getting ugly for people that don't need to get ugly

12 for.

13 Q Do you have a recollection of the police not

14 responding to your initial call?

15 A No. I think it just look a while, if I'm

16 not mistaken. I think I was sitting there for quite a

17 while.

18 Q I have records that show you made a second

19 call to 911 at or about 8:01 p.m. on the same day,

20 April 23, 2014. Do you recall that?

21 A Do you have any cops around here?

22 Q I'll give you the benefit of hearing this

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1 one, too.

2 A Is it me getting mean?

3 (911 recording playback).

4 Q I'm going to stop it there and ask a couple

5 questions.

6 Having heard this, first and foremost, is

7 that your voice?

8 A Um-hum.

9 Q Yes?

10 A Yes.

11 Q And now that you have heard this, do you

12 remember making a second call to 911?

13 A Obviously, yeah.

14 Q Again, you make an indication that the

15 person who was on the property sold it?

16 A Again, assumption. I should have said that.

17 Q And you also indicate that a gentleman had

18 picked it up from the property. Was that also an

19 assumption?

20 A I don't know. It could be chicks running

21 around dump trucks. It's fair to say. It's a paving

22 company with a woman driving it. I just assumed it

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1 was a guy.

2 Q My point being no one told you who was

3 driving the dump truck?

4 A No, no.

5 Q And you didn't see anyone driving the dump

6 truck?

7 A No. I was in bed.

8 Q So you're assuming it at that point in time?

9 A Yes.

10 (911 recording playback).

11 Q After you made that second call on April 23,

12 2014, did an officer come and meet you at the Royal

13 Farm store?

14 A Eventually, yes.

15 Q Did you and he have occasion to speak?

16 A He just wanted to see the documentation that

17 I was talking about. Obviously, he saw what I had and

18 saw that I was telling him what appeared to be very

19 accurate, because DMV, everybody validated this

20 paperwork.

21 Q I understand that.

22 More specifically, did the reference that

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1 you had made in both of your calls to 911 that you

2 believe that the person who took the trailer had

3 purchased it, or that it had been sold to him, did you

4 explain that to the officer?

5 A Yes. He said how did the trailer get here?

6 I said well, I was called. I said, obviously, I'm

7 sick as a dog, but I was called. I was laying in bed

8 and I was told that the trailer was either being

9 stolen or had been sold, because it's leaving not by

10 me and these people knew that I was buying the

11 trailer.

12 Q At that point in time, had you already had

13 the conversation with the gentleman who told you he

14 purchased the trailer?

15 A Yes, because I didn't want it to be a big

16 ordeal. I thought we could talk about it like men

17 and, hey, I want to show you that I legally obtained

18 this trailer and blah, blah, blah, and I'm not just

19 telling you that, and I got the paperwork to validate

20 what I'm telling you. He didn't want to hear it.

21 Q Did you tell the officer that you had called

22 someone at the number you connected with High Noon

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<p style="text-align: right;">Page 50</p> <p>1 Paving?</p> <p>2 A I believe I did, because I wouldn't have</p> <p>3 left something like that out.</p> <p>4 Q Do you recall telling the officer that that</p> <p>5 person reported to you that he had purchased the</p> <p>6 trailer?</p> <p>7 A Yes.</p> <p>8 Q Now, the two of you were at Royal Farm</p> <p>9 store. What happens next?</p> <p>10 A I believe we just ride over, I followed him</p> <p>11 over just to do it right, have an officer there and</p> <p>12 everything, and nobody was there. I think his wife --</p> <p>13 we were walking away and it was either his wife or an</p> <p>14 older female, put it that way, answered the door as we</p> <p>15 were walking away and asked what was going on. He,</p> <p>16 basically, did most of the talking.</p> <p>17 Q "He" being the officer that you were with?</p> <p>18 A Yes, because you don't want the people</p> <p>19 arguing and stuff, and I wasn't there to argue.</p> <p>20 Q Do you remember what he said?</p> <p>21 A No. Obviously, is your husband or somebody</p> <p>22 home that runs this business, and she said no, and he</p>	<p style="text-align: right;">Page 52</p> <p>1 door, she had no idea.</p> <p>2 Q Do you recall the officer having any kind of</p> <p>3 telephonic conversation with anybody?</p> <p>4 A You know what, I think she went and got her</p> <p>5 cellphone maybe. Bear with me, it was two years ago.</p> <p>6 Something like that. For some reason, I want to say</p> <p>7 she either went and got a house phone or a cellphone,</p> <p>8 like a cordless phone or a cellphone and might have</p> <p>9 called him, because he wasn't there to let him know.</p> <p>10 Maybe the officer did speak to him. Now that you say</p> <p>11 that, I do remember her going to get a phone, because</p> <p>12 she was standing in her doorway and she went to get a</p> <p>13 phone.</p> <p>14 Q Do you remember the substance of that</p> <p>15 conversation at all?</p> <p>16 A No, sir. Until you said that, I didn't.</p> <p>17 Q And you didn't see any male resident of the</p> <p>18 house that day?</p> <p>19 A No. There was just an older lady I assumed</p> <p>20 lived there. She appeared to live there.</p> <p>21 Q Just to make the record clear, there were</p> <p>22 three people there, one of whom was you, one was the</p>
<p style="text-align: right;">Page 51</p> <p>1 said he needs to contact us, or whatever, there's</p> <p>2 something in question, I guess. I don't know. It was</p> <p>3 just real short and sweet.</p> <p>4 Q Did you observe any trailer on the property?</p> <p>5 A No.</p> <p>6 Q Did you observe a High Noon Paving dump</p> <p>7 truck on the property?</p> <p>8 A No.</p> <p>9 Q Were there any vehicles marked High Noon</p> <p>10 Paving proximate to that?</p> <p>11 A No, I don't believe there were any</p> <p>12 commercial vehicles with any lettering at the</p> <p>13 property, which wouldn't be common. That was a</p> <p>14 residential area and that's commercial equipment.</p> <p>15 Like I said, you don't park a dump truck and a damn</p> <p>16 near 30-foot trailer on the street.</p> <p>17 Q Once the officers had this conversation with</p> <p>18 the woman who answered the door, what happened next?</p> <p>19 A Just gave me his card and a contact number</p> <p>20 and he would follow up with it, but, obviously, there</p> <p>21 wasn't nothing that we could do at the moment. No one</p> <p>22 was there, no trailer, no people, and the lady at the</p>	<p style="text-align: right;">Page 53</p> <p>1 officer and one was a female?</p> <p>2 A The older female at the residence.</p> <p>3 Q Now, when you left, did the officer indicate</p> <p>4 to you that you should make any kind of formal</p> <p>5 reporting that this was a stolen object?</p> <p>6 A I think we did start the process of</p> <p>7 reporting it stolen.</p> <p>8 Q Tell me about that? What did you do?</p> <p>9 A I can't remember how we went about it.</p> <p>10 Q Did you do it on-site? Did you do it at</p> <p>11 7973 Catherine Avenue?</p> <p>12 A I don't know. I really don't.</p> <p>13 Q Did you sign any paperwork?</p> <p>14 A I don't recall.</p> <p>15 Q Did you give the officer who went to the</p> <p>16 property with you anything in terms of documentation?</p> <p>17 A No. I think it was all just visual. I</p> <p>18 showed him -- I know I definitely showed him the</p> <p>19 title. I definitely showed him the bill of sale.</p> <p>20 Pictures of the trailer -- no, no, I'm lying. I just</p> <p>21 showed him all the paperwork validating the legal</p> <p>22 title and everything for the trailer to validate that</p>

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<p style="text-align: right;">Page 54</p> <p>1 what I was calling them for was accurate.</p> <p>2 <b>Q Did the officer who was present with you</b></p> <p>3 <b>take any of that material from you?</b></p> <p>4 A I don't think so. No, I don't think so. I</p> <p>5 think I made copies or something. I don't think he</p> <p>6 took anything with him, no.</p> <p>7 <b>Q The officer who was present gave you his</b></p> <p>8 <b>card?</b></p> <p>9 A Um-hum.</p> <p>10 <b>Q And when he gave you his card, what, if</b></p> <p>11 <b>anything, did he say to you?</b></p> <p>12 A I think he said he would follow up and try</p> <p>13 to make contact later at another time when the fellow</p> <p>14 was home and that he would contact me, or if he didn't</p> <p>15 contact me, to check back with him.</p> <p>16 <b>Q To your knowledge, did the officer provide</b></p> <p>17 <b>any of your information to either the woman who was</b></p> <p>18 <b>present at the house, or the person to whom he was</b></p> <p>19 <b>speaking on the phone?</b></p> <p>20 A As in like physical?</p> <p>21 <b>Q Name, phone number.</b></p> <p>22 A I don't know.</p>	<p style="text-align: right;">Page 56</p> <p>1 information, documentation that I had, I really</p> <p>2 thought it was going to be cut and paste and, man, it</p> <p>3 was a mistake or whatever and you've got to take her</p> <p>4 to court and sue her or something. You know?</p> <p>5 <b>Q Explain that to me?</b></p> <p>6 A I would assume if you bought the trailer,</p> <p>7 that he would have to go after Dale, the ex-wife. I</p> <p>8 don't know.</p> <p>9 <b>Q At that point in time, you relayed to this</b></p> <p>10 <b>officer what you came to know, which is that Dale</b></p> <p>11 <b>Martin sold this trailer to this gentleman?</b></p> <p>12 A I think he might have told him that. I</p> <p>13 think he might have told him, because he told me at</p> <p>14 that time. By that time, he had told me that he</p> <p>15 bought it.</p> <p>16 <b>Q "He" being, I'll use the name Edwin Drury,</b></p> <p>17 <b>told you that on the telephone before you went to the</b></p> <p>18 <b>property?</b></p> <p>19 A Oh, yeah, because I called him. I'm not</p> <p>20 just going to roll up on somebody's house and give me</p> <p>21 my trailer. I wanted to explain to him you were seen</p> <p>22 leaving the property. It was a real simple phone</p>
<p style="text-align: right;">Page 55</p> <p>1 <b>Q Do you know if the officer --</b></p> <p>2 A I'm actually hard of hearing and I actually</p> <p>3 stood back per his request. I stayed a respectful</p> <p>4 distance not to have two big guys standing at your</p> <p>5 door. You know what I mean? Me being somebody</p> <p>6 looking for something, it just doesn't look right, so</p> <p>7 he had me stay back. I was 20 feet back give or take.</p> <p>8 <b>Q Mr. Bradford, would it be accurate to say</b></p> <p>9 <b>that you really weren't able to hear what was</b></p> <p>10 <b>happening during the conversation back and forth with</b></p> <p>11 <b>the officer?</b></p> <p>12 A It's fair to say. Like I said, he was doing</p> <p>13 a lot of talking just as an officer would do to keep</p> <p>14 the peace not knowing who was going to answer the</p> <p>15 door.</p> <p>16 <b>Q And when you left 7973 Catherine Avenue, was</b></p> <p>17 <b>there any expectation as to if or when --</b></p> <p>18 A I left no further ahead than when I called.</p> <p>19 <b>Q Did you have any belief that the trailer was</b></p> <p>20 <b>going to be returned to you the next day?</b></p> <p>21 A Honestly, I thought it would be. I thought</p> <p>22 they would make contact. After showing all of the</p>	<p style="text-align: right;">Page 57</p> <p>1 conversation. You were seen leaving the property with</p> <p>2 the trailer, I have documentation proving that I</p> <p>3 bought it, and that it's legally titled and registered</p> <p>4 in my name, and I have temporary tags to transport it.</p> <p>5 He told me he bought it for \$2,200.00, I think, and</p> <p>6 it's his trailer. I said I'm telling you you're</p> <p>7 mistaken.</p> <p>8 <b>Q And that's before you went to the property?</b></p> <p>9 A Yes, that was earlier in the day.</p> <p>10 <b>Q And you told the officer who met you at</b></p> <p>11 <b>Royal Farm that it had been reported to you that Dale</b></p> <p>12 <b>Martin sold the trailer to this gentleman; correct?</b></p> <p>13 A Yes.</p> <p>14 <b>Q Do you know when the officer had a</b></p> <p>15 <b>conversation with Edwin Drury if he, again, told him</b></p> <p>16 <b>he purchased the trailer?</b></p> <p>17 A I have no idea. I wasn't around for</p> <p>18 anything after that.</p> <p>19 <b>Q Was there ever any conversation between you</b></p> <p>20 <b>and the officer that the proper party to pursue</b></p> <p>21 <b>criminally would be Dale Martin?</b></p> <p>22 A I don't know. I mean I really don't know.</p>

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<p>Page 62</p> <p>1 A I only recall speaking to him that one time 2 to try and solve the issue, like, hey, I want to show 3 you what I have, you have a stolen trailer. 4 <b>Q And that one time was the day before,</b> 5 <b>April 23rd?</b> 6 A Yeah, because I wouldn't have called the 7 cops without trying to at least contact the guy and 8 say hey, I don't want to put nobody in trouble that 9 ain't got to be. 10 <b>Q The indication that you have information on</b> 11 <b>who currently has the trailer, do you know what that</b> 12 <b>was in reference to, where it says here Caller advised</b> 13 <b>someone sold a trailer who did not have authority to</b> 14 <b>sell it, has the information on who currently has the</b> 15 <b>trailer?</b> 16 A He did. 17 <b>Q So it's the same information as the day</b> 18 <b>before?</b> 19 A Oh, yeah. I mean unless you know something 20 I don't know. To this day, to this day, that's the 21 last time I've seen the trailer. 22 <b>Q When you took the photograph that is marked</b></p>	<p>Page 64</p> <p>1 any of the paperwork. I think because I was sick and 2 didn't want to go anywhere, I think I just took 3 pictures with my phone and e-mailed them, I think. 4 That's all that pops into my head. 5 <b>Q Do you know what, if anything, happened in</b> 6 <b>response to your telephone call to the Anne Arundel</b> 7 <b>County Police Department on April 24th?</b> 8 A Do I know what, if anything, happened? 9 <b>Q Yes. Was there any response?</b> 10 A Just that I believe I was told that he was 11 arrested, and they still don't know what's up with the 12 trailer. To this day, I don't know. That's why I 13 called you, I think, two days ago and left you a 14 message? 15 <b>Q Me?</b> 16 A Uh-uh. 17 <b>Q I don't think I got that, I'm sorry.</b> 18 A Well, I called the office and I said I have 19 no clue what you might want from me. I'm at work and 20 you won't be able to get me. I'm on daywork and you 21 won't be able to get me until about 3:30 or, I think, 22 4:00 I said.</p>
<p>Page 63</p> <p>1 as Bradford I? 2 A Yes. 3 <b>Q And that was before the date that you</b> 4 <b>purchased it?</b> 5 A That's the last time I've seen it, and the 6 last thing I was told by the fellow I spoke to on the 7 phone was I have the trailer and you're not getting 8 it. That was told directly to me. 9 <b>Q In conjunction with saying he bought it?</b> 10 A Yes, because he felt as though he bought it. 11 He said I paid cash for it. I said wouldn't you think 12 it's odd that you paid cash for something and you 13 didn't get any title or anything for it? I said I 14 have a title for it. 15 <b>Q Do you remember if any member of the Anne</b> 16 <b>Arundel County Police Department came to your house at</b> 17 <b>506 Likeston Court in response to the call on</b> 18 <b>April 24th?</b> 19 A I don't know. I think I sent -- I think I 20 sent -- the reason why I think these are bigger now is 21 because I think I sent an e-mail, because I was asked 22 if I had pictures, or anything like that, or copies of</p>	<p>Page 65</p> <p>1 <b>Q You did not go to 7973 Catherine Avenue on</b> 2 <b>April 24th, did you?</b> 3 A The Royal Farm? 4 <b>Q No.</b> 5 A I didn't go anywhere. The only time I went 6 to the gentleman's house was the day that I was 7 waiting ever so patiently for the police, and then we 8 spoke to the lady at the house. That was it. 9 <b>Q Did you ever give any officers from Anne</b> 10 <b>Arundel County contact information for Cathy Jo West?</b> 11 A I don't know. I mean a bill of sale, the 12 title, the picture of the old title, the picture of 13 the new title with my name on it. I don't know. 14 <b>Q Have you ever initiated any legal action to</b> 15 <b>try to gain possession of the trailer, meaning a</b> 16 <b>replevin action, a wrongful detainer action, a</b> 17 <b>wrongful conversion action?</b> 18 A Honestly, I haven't, because I've got bigger 19 fish to fry. What I deal with in a day, this trailer 20 is peanuts. You know, karma, I don't deal with people 21 like that. Things will sort themselves out and maybe 22 one day I'll get a phone call, hey, here's your</p>

<p style="text-align: right;">Page 66</p> <p>1 trailer. I'm not pressed about it. I've got bigger 2 issues. I've got a daughter with special needs and 3 this stuff is petty to me. 4 <b>Q Did anybody ever indicate to you that you</b> 5 <b>could pursue such a civil action?</b> 6 <b>A Yeah, many people have, but, like I said,</b> 7 <b>it's been an interesting couple of years, and I have</b> 8 <b>more important things to worry about. This will all</b> 9 <b>wash out one way or another. I know it wouldn't</b> 10 <b>happen overnight or whatever, especially knowing now</b> 11 <b>it was in a divorce and all that crap.</b> 12 <b>Q Did you have any communication with Cathy Jo</b> 13 <b>West, or have you had any conversation with Cathy Jo</b> 14 <b>West since April of 2014?</b> 15 <b>A I just told her, look, that one time I told</b> 16 <b>you figure it out whatever you need to do. I bought</b> 17 <b>this trailer from you, and I'm holding you responsible</b> 18 <b>to get me access to what I bought. You can't go</b> 19 <b>selling things and then the people not be able to have</b> 20 <b>them.</b> 21 <b>Q That was before you went to the property?</b> 22 <b>A Yeah. That was back when we were talking in</b></p>	<p style="text-align: right;">Page 68</p> <p>1 probably. I don't even know what happened after they 2 said he was arrested. I don't even know. I have no 3 clue. 4 <b>Q Just to be precise for the record, on April</b> 5 <b>23, 2014, you go out to the property with an officer,</b> 6 <b>the trailer is not there, the person who you spoke to</b> 7 <b>wasn't there --</b> 8 <b>A The reason I didn't do anything was --</b> 9 <b>Q Bear with me for a minute.</b> 10 <b>Did that officer tell you that particular</b> 11 <b>day that you could initiate a civil action to gain</b> 12 <b>possession of the trailer?</b> 13 <b>A No. Just said it would probably turn into a</b> 14 <b>civil matter, but that was before he got arrested,</b> 15 <b>which I assumed eventually this would pan out, because</b> 16 <b>he got arrested and then I would get my trailer back,</b> 17 <b>but, to this day, I couldn't tell you anything about</b> 18 <b>that. I didn't feel the need to go further, because I</b> 19 <b>figured okay, he got arrested, it's clearly going to</b> 20 <b>get sorted out. I'm not going to waste the time or</b> 21 <b>money to go to court when I don't need to, because</b> 22 <b>this is all being washed out and life happens and I'm</b></p>
<p style="text-align: right;">Page 67</p> <p>1 the very beginning. I don't even think she lives 2 around here anymore. 3 <b>Q Were you familiar with a dump truck for sale</b> 4 <b>as well?</b> 5 <b>A No.</b> 6 <b>Q Do you know if Cathy Jo West and Dale Martin</b> 7 <b>have been engaged in any litigation since the time of</b> 8 <b>this happening?</b> 9 <b>A No. I bought a trailer. I mean really, if</b> 10 <b>I knew something, I would tell you. I bought a</b> 11 <b>trailer, and I thought I crossed all my T's and dotted</b> 12 <b>my I's to buy it to make sure what I was buying was</b> 13 <b>legit, and from what I was told by DMV, her paperwork</b> 14 <b>was legit.</b> 15 <b>Q Did the police officer that you met with on</b> 16 <b>April 23, 2014 ever indicate to you that you could</b> 17 <b>file a civil action?</b> 18 <b>A Yes, I was told I could go to court. Again,</b> 19 <b>I had --</b> 20 <b>Q I understand you had a lot going on. I just</b> 21 <b>want to know if that officer ever indicated to you --</b> 22 <b>A Yeah, it would be turned into a civil matter</b></p>	<p style="text-align: right;">Page 69</p> <p>1 just figuring all right and then I get a subpoena. 2 <b>Q The same officer who you were present with</b> 3 <b>at 7973 Catherine Avenue on April 23rd, is that the</b> 4 <b>person who told you this would likely turn into a</b> 5 <b>civil matter?</b> 6 <b>A Um-hum.</b> 7 <b>Q Is that a yes?</b> 8 <b>A Yes. I'm sorry. And so did the 911</b> 9 <b>operator.</b> 10 <b>Q Before you ever went out to the property?</b> 11 <b>A Right. Again, that's where it was going to</b> 12 <b>go, but, in my eyes, once he got arrested, I said</b> 13 <b>okay, then this is going to -- this is accurate. This</b> 14 <b>is what's going to happen and I'll get my stuff back.</b> 15 <b>I said I'm not going to waste the time and money</b> 16 <b>getting a lawyer when it looks like the law is taking</b> 17 <b>care of it, or laws.</b> 18 <b>Q We heard the tape earlier today and the</b> 19 <b>recording. The 911 operator that you initially</b> 20 <b>contacted told you this is a civil matter in which the</b> 21 <b>police cannot get involved?</b> 22 <b>A Do what now?</b></p>



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Pages 74..77

<p style="text-align: right;">Page 74</p> <p>1 A I can't remember. I know there was a title 2 present. Whether it was my finished title, which I 3 want to say it would have been. Yes, I want to say it 4 would have been.</p> <p>5 Q Okay.</p> <p>6 A I want to say I would have had a title with 7 my name on it, because I wouldn't have had the old 8 title there if I went to the DMV. I think I would 9 have had, yeah, I think I would have had my title.</p> <p>10 Q The very first time you called the police 11 about this trailer, did you tell the police that it 12 was stolen?</p> <p>13 A I believe it to be, because like I said, the 14 people that witnessed it leaving knew I couldn't go 15 get it, knew that I bought it, or was buying it, and 16 here it's leaving not by me.</p> <p>17 Q I understand that you believed that it was 18 stolen. My question is, did you tell the police that 19 it was stolen?</p> <p>20 A I'm sure I might had.</p> <p>21 Q Would you have used the word "stolen" to 22 convey that information to the police?</p>	<p style="text-align: right;">Page 76</p> <p>1 A I don't know.</p> <p>2 Q Do you have any recollection of him, that 3 being the person who had the trailer, telling you that 4 he was going to scrap it or destroy it?</p> <p>5 A No.</p> <p>6 MR. CULPEPER: I have no further questions.</p> <p>7 MR. IAMELE: I don't have any questions.</p> <p>8 Mr. Bradford, you are not represented in 9 this case. Everything that we have discussed here 10 today is being typed. You are permitted to read the 11 transcript that is produced from this deposition to, 12 one, check for errors in terms of your verbiage, or 13 two, check for factual errors. You are not compelled 14 to do that and you can waive it, if you so choose.</p> <p>15 THE WITNESS: I think you all know I'm being 16 as honest as I can be here and I have no ill intent, 17 and, like I said, I've got more important things. If 18 the trailer comes about, I still have a legal title 19 and registration for it. If it don't, I'm out 20 \$1,500.00 and, you know, whatever. That's the way the 21 law works I guess.</p> <p>22 MR. CULPEPER: Would you like to waive your</p>
<p style="text-align: right;">Page 75</p> <p>1 A Yeah.</p> <p>2 Q And you did speak with the gentleman who had 3 the trailer on the telephone at least once; correct?</p> <p>4 A Yes, I think once. Yes, I think it was 5 once.</p> <p>6 Q He told you he had the trailer?</p> <p>7 A Yes.</p> <p>8 Q You told him you had a title to the trailer?</p> <p>9 A Um-hum. And then I questioned him briefly 10 why would you buy something for cash, one, and not 11 have anything to validate you buying the trailer? He 12 said he didn't get a title, he didn't get a 13 registration, he didn't get a receipt. He said I gave 14 her \$2,200.00 cash. I said well, then, to me you 15 stole it, because nobody does that. You don't give 16 away money for no proof.</p> <p>17 Q And he told you he could make a bill of 18 sale?</p> <p>19 A That's what he told me on the phone.</p> <p>20 Q Do you know whether he did make a bill of 21 sale?</p> <p>22 MR. IAMELE: Objection.</p>	<p style="text-align: right;">Page 77</p> <p>1 right to get a copy of this transcript and look for 2 corrections to make?</p> <p>3 THE WITNESS: I don't think it would hurt to 4 have one. I don't know.</p> <p>5 MR. IAMELE: It doesn't hurt, but you have 6 to make an election as to whether or not you're going 7 to review it.</p> <p>8 THE WITNESS: What do you think?</p> <p>9 MR. CULPEPER: You're looking at me a lot 10 during the course of this deposition. Just for the 11 record --</p> <p>12 THE WITNESS: I know. You're representing 13 Anne Arundel County and not me.</p> <p>14 MR. CULPEPER: Right.</p> <p>15 If you were being deposed as an Anne Arundel 16 County employee, I'm your lawyer, but in this context, 17 I'm not your lawyer.</p> <p>18 THE WITNESS: I understand.</p> <p>19 MR. CULPEPER: If you were my client, I 20 would tell you probably that you could waive with this 21 deposition.</p> <p>22 THE WITNESS: I've never had a deposition,</p>